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ENVIRONMENTAL DEFENSE

finding the ways that work

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Washington, DC 20009
202-387-3500

October 28, 2003

Whittington W. Clement
Secretary of Transportation
Ninth Street Office Building
202 North 9th Street, 5th Floor
Richmond, VA 23219

RE: Request for Supplemental Environmental Impact Statement for Capital Beltway

Dear Secretary Clement:

I am writing on behalf of Environmental Defense's thousands of members in Virginia concerning the recent decision by the Commonwealth Transportation Board to include the Fluor Daniel HOT Lanes proposal as an alternative in the Capital Beltway Study.

Environmental Defense supports wider use of market incentives such as HOT lanes when these are implemented to expand travel choices and reduce pollution. It is very appropriate to include HOT lane alternatives in the Capital Beltway Study, but we request you to undertake a Supplemental Environmental Impact Study (SEIS) to evaluate alternatives in addition to the one submitted by Fluor Daniel.

We urge you to ensure fuller consideration of this HOT lane proposal in conjunction with fuller consideration of strategies to:

- encourage transit-oriented development and transit improvements to reduce the need to expand highway capacity in the corridor, including a more thorough study of the rail alternatives proposed by many community and environmental groups,
- ensure adequate ongoing funding of expanded transit services in the region, including dedication of a significant portion of any HOT lane toll revenues to pay for transit operations in the corridor, as in the I-15 corridor in San Diego,
- optimize the design of Bus Rapid Transit (BRT) options and services in the corridor, including efficient in-line, on-the-Beltway BRT stations at junctions with metro and commuter rail lines and key activity centers, arterial BRT elements on adjacent highways and streets, and transit route refinement,
- improve pedestrian and bicycle access to and from transit stops and trip generators in the corridor, with continuous networks and guarded bicycle parking at stations,

- consider addition of a single additional HOT lane (rather than two as Fluor Daniel proposes) in each direction on the Beltway, combined with conversion of one or two general purpose lanes to managed HOT or FAIR lanes in each direction.

Fluor Daniel's proposal helps expand consideration of important strategies for managing scarce road capacity in this corridor and using that capacity to better support transit. But it is the responsibility of Virginia DOT and the Federal Highway Administration to ensure that the environmental review process fully considers alternatives and elements that would avoid, minimize, or mitigate adverse impacts on human health and the environment. Your review must consider additional reasonable and available strategies that would avoid adverse health impacts that are likely to result from expansion of the Beltway.

Fluor Daniel's proposal has not included as estimated project costs the essential impact avoidance elements outlined above, and hence understates true costs. Without these elements, adding two lanes in each direction on the Beltway will induce additional traffic that will result in increased exposure of many thousands of people to higher levels of toxic hazardous air pollutants. As Attachments 2, 3 and 4 to this letter detail, these effects must be accounted for in the environmental review and project approval process.

Staff at the Federal Highway Administration have already evaluated some alternatives similar to the ideas outlined above that could help reduce traffic growth and adverse health and environmental impacts. This is shown Attachment 1, a study from this past January published by the Transportation Research Board of the National Academy of Sciences. Alternative 6 in this analysis is similar to the Fluor Daniel HOT lane proposal, and is estimated to increase traffic by 12 percent (36,000 vehicles per day) in the corridor, likely resulting in significantly increased air toxics emissions. Alternative 5 in this analysis (one added HOT lane in each direction and two existing lanes converted to HOT, with FAST lane pricing to give travel credits to motorists in the unpriced express lanes) is similar to the add-lane, convert-lane option suggested above, and is estimated to induce only 2 percent more traffic (6,400 vehicles per day). The 10-lane Alternative 5, with half as many new lane-miles of road capacity and lower capital costs, produces nearly equal traffic delay reduction with fewer freeway lanes compared to Alternative 6, with its 12 lanes. The 10-lane Alternative 5 option has fewer adverse health impacts and generates three times the toll revenue of the 12-lane option. This suggests that a 10-lane HOT alternative would be far more capable of having a significant portion of its toll revenue dedicated to pay for expanded transit operations in the corridor. This is a critical consideration when the Washington area Metro system is facing huge funding shortfalls and is being forced to raise fares and cut service. The FHWA FAST lane pricing concept merits consideration as a strategy for introducing managed lanes in the corridor and should be reviewed in an SEIS.

An SEIS for the Capital Beltway project should include opportunities for public involvement and comment prior to a record of decision. If a selected alternative is likely to increase adverse health impacts due to traffic and emissions growth, these should be mitigated by various measures, such as funding accelerated efforts to clean up dirty diesel vehicles and equipment operated in the corridor, application of the measures discussed above, and acquisition of buffer zones adjacent to the Beltway in the areas of greatest health risk.

We would be pleased to discuss these ideas in greater detail with you or your staff. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, reading "Michael Replogle". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Michael Replogle
Transportation Director

Cc: Philip Shucet, VDOT Commissioner
Karen Rae, VDRPT Director

Attachment 1: "Evaluation of Toll Options Using Quick-Response Analysis Tools: A Case Study of the Capital Beltway"

Attachment 2: "Adverse Health Risks from Toxic Air Pollutants and Fine Particles Emitted by Highway Vehicles Demand Consideration of Alternatives for Expansion of High Traffic Volume Highways", October 24, 2003

Attachment 3: Sierra Club vs. USDOT, et.al., August 29, 2003 Plaintiff's Response to Defendant's Cross Motion for Summary Judgment

Attachment 4: Sierra Club vs. USDOT, et.al, October 17, 2003, Plaintiff's Reply in Support of Motion for Summary Judgment



COMMONWEALTH of VIRGINIA

Whittington W. Clement
Secretary of Transportation

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November 14, 2003

Mr. Michael Replogle
Transportation Director
Environmental Defense
1875 Connecticut Avenue NW, Suite 600
Washington, D. C. 20009

Dear Mr. Replogle:

Thank you for your recent letter regarding the Capital Beltway Study. I appreciate your interest in this important project.

The Federal Highway Administration has informed VDOT that a Supplemental Environmental Impact Study will not be necessary; however, Commissioner Shucet informs me that he is meeting with you soon to further discuss this issue.

Again, thank you for your interest in this important transportation study.

Sincerely,

A handwritten signature in dark ink, appearing to read "Whittington W. Clement".

Whittington W. Clement

WWC:es

Copy: Mr. Philip A. Shucet